

Statement of Basis - Narrative **TV and Acid Rain Permits**

Company: Public Service Company of New Mexico (PNM) - (Air Quality)

Facility: Public Service Co of New Mexico - San Juan Generating Station

Permit No(s): 0063M7 and P062R2M1 and P062AR2

Tempo/IDEA ID No.: 1421 - PRT20090001, and PRT20090002

Permit Writer: Joseph Kimbrell

Permit Review	Date to Enforcement: 7/23/2012	Inspector Reviewing: Robert Samaniego
	Date Enf. Review Completed:	Date of Reply: (if necessary)
	Date to Applicant: 7/23/2012	Date of Reply:
	Date of Comments from EPA:	Date to EPA: 7/20/2012
	Date to Supervisor: 6/27/2012,	
	P062R2: May 7, 2010 comments on draft permit received from WildEarth Guardians and San Juan Citizen Alliance. Reply to comments sent on August 4, 2010. See Attached.	
	P062R2: EPA ROC dated 9/20/10, NMED response dated 10/29/10. See attached	
	P062R2: Based on comments in EPA ROC, sent email on CO PSD concern to PNM, 10/4/10. Received PNM response dated 10/25/10. See attached.	
	P062R2: November 19, 2010, WildEarth Guardians files petition to US EPA requesting Administrator object to the TV permit to be issued.	
	P062R2: NMED decides not to hold hearing on draft comments since permit petitioned to EPA.	
	EPA Order for P062R2, March 2012	
	NMED Response to EPA Order, awaiting release by NMED-AQB Richard Goodyear as of 7/20/2012.	

1.0 Plant Process Description:

PNM SJGS is a coal-fired electric generating station located approximately 3 miles north-northeast of Waterflow, New Mexico. The facility consists of four coal-fired boilers (Units 1-4) which burn coal received by conveyors from the adjacent San Juan Mine to generate high-pressure steam that powers a steam turbine coupled with an electric generator. Electric power thus produced by the units is supplied to the electric power grid for sale. This is a pulverized coal fired power plant with 4 boilers. The boilers began operations in 1976, 1973, 1979, and 1982.

2.0 Description of this Modification:

- Re-open Title V permit P062R2 to include changes as discussed in NMED's response to EPA Order concerning public notice comments and petition from WildEarth Guardians and other environmental groups.
- A minor modification per the provisions of 20.2.70.404.B. The purpose of this modification application is to add permit limits that were incorporated into SJGS NSR permit revisions 0063M6R2 issued 5/16/2011 and 0063M7 issued 12/14/2011. NSR revision 0063M6R2 added an additional permit limit, for each boiler unit, of 0.15 lbs/MMBtu SO₂ (30-day rolling average) to the previously existing boiler SO₂

emission limits. Permit revision 0063M7 added a Total (condensable plus filterable) PM_{2.5} emission limit of 0.034 lbs/MMBtu to each boiler unit. These Total PM_{2.5} limits are in addition to the previously existing filterable only particulate matter emission limits.

3.0 **PSD Applicability:**

Title V action does not determine PSD applicability; see the History Table for a summary of previous PSD applicability determinations.

- A. This facility is an existing PSD Major Source. SJGS is a major source under both 20.2.70 NMAC (Title V) and under 20.2.74NMAC (PSD). SJGS has a Title V Operating Permit, but does not have a 20.2.74 NMAC (PSD) permit as the facility was constructed prior to applicability of 20.2.74NMAC and has not undergone a major modification as of the date of the last NSR permitting action, see history table.

4.0 **History (In descending chronological order, showing NSR and TV):** *The asterisk denotes the current active NSR and Title V permits that are have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0063M8	TBD	Significant Revision	Application estimated to be submitted around January 2012 to modify the facility for SCR in accordance with EPA-FIP. Even though the FIP is being challenged in court, PNM must proceed with the application to allow time to get permit issued and 5-year for construction and still meet EPA's construction deadline in the FIP. Alternative scenario will include SNCR.
P062R2M2	TBD	Minor Modification	Update per EPA Order and changes authorized by NSR 63M6R2, 63M7 and Administrative Revision P062R1M1.
0063M7	12/14/11	Significant Revision	The modification consisted of adding a permit limit for Total PM-2.5 (filterable plus condensable PM _{2.5}), increasing the facility-wide annual diesel fuel usage, and revising the Duct leak PM-2.5 calculations based on available PM-2.5 size fraction information. No increase in emission limits are being added.
0063M6R2	5/16/11	Tech Rev	Reduces the sulfur dioxide (SO ₂) emission limits for the four main boilers to 0.015 lb/MMBtu and reduces the total SO ₂ annual emissions. Convert NSR Permit to new Table format to match Title V permit was not accomplished over objection from PNM. PSD Applicability: This facility is an existing PSD Major Source. The project emissions for this modification are not significant. Netting is not required (project is not significant). BACT is not required for this modification (minor Mod).
P062R2M1	3/28/2011	Admin Rev	Corrected Typo error, added correct Reporting Schedule at Condition A109.A and B.
P062R2 & P062AR2	1/24/2011	Renewal	Renewal of Operating and Acid Rain Permits and includes modification authorized by NSR 0063M4 thru 63M6R1. Removal of emergency generator from permit condition since there meet the definition of emergency generators and insignificant activities. Convert to new Table permit format.
*0063M6R1	9/12/2008	Tech Rev	SJGS is proposing to add fabric filters Units S518 and S519 (baghouses) to the existing Unit 1 and Unit 2 fly ash silos (one silo per unit). These fabric filters will replace control provided by the current ESPs and will be provide more efficient PM control than the current ESPs.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
			PSD Applicability: This facility is an existing PSD Major Source. The project emissions for this modification are not significant. Netting is not required (project is not significant). BACT is not required for this modification (minor Mod).
*0063-M6	4/22/2008	Significant Revision	This modification consists of revising the permit to impose as enforceable permit conditions that limit the amount of particulate emitted into the air from the activities associated with delivery and injection of activated carbon into the combustion exhaust of each boiler. The activated carbon is used to control mercury emissions. There will be four silos (one for each boiler) constructed. Each silo will have a baghouse. The emissions established in 0063M4 are sufficient enough to include any extra emissions originating from the carbon injection. The particulate emissions limit from the boiler stack will remain unchanged. Emissions are generated from the delivery of the activated carbon, loading activated carbon, operations of the silo, cleaning of the baghouse, and those emissions that were not captured by the boiler's baghouse. The operations of the silo require a constant stream of air to flow through the activated carbon to keep it fluid.
0063M5R1	12/5/2007	Admin Rev	This revision consists of adding an emergency Cummins Diesel generator model DSHAF located at the SJGS data center as an exempt piece of equipment.
*P062R1M1	6/11/2007	Significant Revision	Incorporate NSR Permit 0063M3 conditions into body of TV. This changed the Carbon Monoxide (CO) emission rates for Units 1-4. The permit template language was updated. This was discussed with Cathy Penland of EPA Region 6 on 2/12/07. At final review stage, Richard Goodyear directed the reference to the Compliance Schedule from NSR 0063M4 in Condition 7.4 be removed since the schedule was not as a results of this facility being out of compliance IAW our State Regulations.
0063M5	Withdrawn 10/20/06	Reg. Significant Revision	Temporary pumps in the river.
0063M4	Sept 18, 2006	Reg. Significant Revision	This modification consists of adding fabric filters to each boiler, replacing the existing boiler burners with low-NOx burners, and increasing the control efficiency of the wet limestone scrubber. NSR 0063M4 includes all requirements of the March 10, 2005 Consent Decree. The Air Heaters were original equipment. Each Fabric Filter came on-line on the following dates: (when oil was fired through them for first time), [required deadline] Unit 1: [10/31/08] Unit 2: [3/31/09] Unit 3: [4/30/08] Unit 4: [10/31/07]
0063M3	Sept. 20, 2005	Reg. Significant Revision	This modification consists of raising the carbon monoxide (CO) emissions limits for Boiler Units 1-4 to reflect the results of recent stack testing. The initial compliance testing performed on Units 1-4 in accordance with Specific Conditions in NSR 0063M2, revealed the estimated CO emissions permitted could not be met. The 1997 NSR Permit 0063M2 was for the replacement of the Limestone scrubber control system for SO2. Since the facility was so old, CO

Permit Number	Issue Date	Action Type	Description of Action (Changes)
			testing had never been required and the permitted CO limits had been based on calculation. As part of the Permit 63M2 PNM was required to perform CO EPA Method Test for the first time. The limestone scrubbers have nothing to do with CO emissions. So the CO method test was used to verify existing CO emissions due to NO modification to the facility. The Permit 0063M3 increased the permitted emissions from ~2,000 to ~39,000 as a result of the CO Method test.
	Mar 10, 2005 (signed 3/9/05)	Date lodged in Court	The Department and PNM consent to entry of Consent Decree without further trial or appeal. Refer to complete Consent Decree for complete history of events.
P062R1	Feb. 4, 2005	Renewal	Incorporated NSR Permit 0063M2 and 0063M2R1. This permit for first time required CO compliance Testing. Units E301, E302, E303, and E304 (boilers) are subject to periodic compliance testing for PM, TSP, PM-10, PM-2, CO, and VOC using stack tests and Unit E803 is subject to periodic compliance testing for PM using stack tests. The tests for PM, TSP, PM-10, and PM-2 on Units E301, E302, E303, and E304 (boilers) shall be performed within 6 months of issuance of this permit and annually thereafter. The tests for CO and VOC on Units E301, E302, E303, and E304 (boilers) shall be performed within 6 months of issuance of this permit and quarterly thereafter. The tests on Unit E803 shall be performed at the discretion of the Department. CO test results from May 2005 test showed permit limits exceedance and application for NSR Application developed for NSR 63M3. Next quarterly test in July 2005 showed CO levels needed to be adjusted for summer high temperatures, resulting in the permit limits established in NSR 63M3.
	May 26, 2004	Order entered	Found 42,008 opacity limit violations would be addressed in the remedy phase.
	May 16, 2002	Citizen Suit	Grand Canyon Trust and Sierra Club filed citizen suit against PNM alleging violations of CAA, violating the 20 % opacity emission limits for Units 1-4, and units 3 and 4 did not have a PSD permit. In the CD PNM was awarded summary judgment on the PSD issue "WHEREAS, on August 20, 2003, the Court granted PNM's motion for summary judgment on Plaintiffs' PSD claim
0063M2R1	Sept 17, 1999	Technical Revision	This revision allowed the use of a previously idle cooling tower at the facility (Emission Unit E411 in Title V Permit No. P062R1).
P062	June 28, 1998	New Title V	First Operating Permit
0063M2	Jan. 22, 1997	Reg. Significant Revision	New FGD reduced SO ₂ emissions. This modification allowed for construction of limestone forced oxidation scrubbers to replace older Wellman-Lord FGD system scrubbers for SO ₂ control. This NSR permit also brought the four generating units (1, 2, 3, 4) at the facility under a single NSR permit (they had previously been permitted separately). This permit supercedes all previous permits. Each Scrubber cell with the new limestone system came on-line on the following dates: Unit 1: Unit 2: Unit 3: Unit 4:
0063M1	Jan. 5, 1987	Modified and	This permit is in response to Company Ltr dated 11/13/1986

Permit Number	Issue Date	Action Type	Description of Action (Changes)
		reissued	requesting that the air quality permit for Unit 4 at the San Juan generating Station be modified and reissued to conform to the 1980 amendments to the Air Quality Control Regulation 602 regarding sulfur dioxide emission rates.
0062M1	Jan. 5, 1987	Modified and reissued	This permit is in response to Company Ltr dated 11/13/1986 requesting that the air quality permit for Unit 3 at the San Juan generating Station be modified and reissued to conform to the 1980 amendments to the Air Quality Control Regulation 602 regarding sulfur dioxide emission rates.
0013M1	Jan. 5, 1987	Modified and reissued	This permit is in response to Company Ltr dated 11/13/1986 requesting that the air quality permit for Unit 1 at the San Juan generating Station be modified and reissued to conform to the 1980 amendments to the Air Quality Control Regulation 602 regarding sulfur dioxide emission rates.
0063	Sept 15, 1975	Cert. Of Registrn.	To install Unit # 4
0062	1982	Cert. Of Registrn.	To install Unit # 3. These documents could not be located at this time, 2/1/2007.
0013	1975	Cert. Of Registrn.	To install Unit # 1. These documents could not be located at this time, 2/1/2007.
Cert. Of Registrn.	Oct. 5, 1973	Cert. Of Registrn.	To install Unit #2. These documents could not be located at this time, 2/1/2007.

5.0 **Public Response/Concerns:** As of 5/6/10 there have been many comments from the public on the draft permit and they will be summarized and addressed in next update. Public comment period ran from 4/2/10 through 5/2/10, with last comments received on May 7, 2010.

Approximately 300 emails concerning Green House Gas (GHG) emissions were received. Two letters were received by email: one signed by Jeremy Nichols, WildEarth Guardians dated May 7, 2010 with co-signatures of four other environmental groups; and one signed by Mike Eisenfeld, San Juan Citizens Alliance dated May 7, 2010 also with co-signatures of four other environmental groups.

Reply to the ~300 email sent by Ned Jerabek via email. Reply to the two letters were emailed by Joseph Kimbrell on August 04, 2010.

No significant changes to the draft permit were made as a result of comments. However, there is a high probability that this permitting action will go to Public Hearing only because of the number of emails and co-signatures on the letters.

6.0 **Compliance Testing:**

Unit No.	Test Description	Test Date
1,2,3,4	EPA Method 5 for Particulate Matter	12/15 – 12/17/2008
1,2,3,4	EPA Method 10 for CO	12/15 – 12/17/2008

The boilers have CEMS for NOX and SO₂. The boilers have continuous opacity monitors (COMS) for particulate. Quarterly testing is required for TSP, PM₁₀, and CO.

7.0 **Startup and Shutdown:**

- A. Was a Startup, Shutdown, and Malfunction Plan (SSM) submitted: Yes.
- B. Were emissions from startup, shutdown, and scheduled maintenance operations calculated and included in the emission limits? Yes.
- C. Based on past operational experience, SJGS has experienced periods of excess emissions during startup and shutdown. The environmental improvement programs being made as part of the consent decree are expected to substantially reduce, but not totally eliminate the possibility of emissions in excess of normal permit limits during startup and shutdown. PNM has conducted a review of available experience during operation with the new environmental systems. Based on this review, PNM anticipates that SJGS will have ~~to~~ potential to exceed normal operation permit limits during SSM for NO_x only. On this basis PNM has included specific SSM limits for NO_x in Table 2-F of the permit application for P062R2.

8.0 **Compliance and Enforcement Status [Title V only]:** The PNM San Juan Generating Station is currently involved in an active Consent Decree for violating the emission limits for NO_x, SO₂, particulate matter, and opacity. At this time they appear to be in compliance with the conditions of the Consent Decree. Renae Held, March 2, 2009

9.0 **Modeling:** No modeling is or was needed for this action.

10.0 **State Regulatory Analysis(NMAC/AQCR):**

STATE REGU- LATIONS CITATION	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	JUSTIFICATION FOR USE:
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	X		X	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. For NSR permit this applies, For Title V permit this does not apply.
20.2.5 NMAC	Source Surveillance	X			Excess Emissions During Malfunction, Startup, Shutdown, or Scheduled Maintenance
20.2.7 NMAC	Excess Emissions	X		X	All Title V major sources are subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and are thus subject to the requirements of this regulation. Also listed as applicable in NSR Permit NM063M6R1.
20.2.14 NMAC	Particulate Emissions from Coal Burning Equipment		E301, E302, E303, E304	X	Limits PM emissions from main boiler stacks. 0.05 lb TSP/mmBtu (3-hr avg) OR 0.02 lb PM2/mmBtu(E301,E303,E304), 0.04 lb PM2/mmBtu (E302).
20.2.31 NMAC	Coal Burning Equipment - Sulfur Dioxide		E301, E302, E303, E304	X	Limits SO2 emissions from main boiler stacks. 13,000 lbs/hr (combined, 3-hr avg); 0.55 lb mmBtu (30-day avg); 1.2 lbs/mmBtu (3-hr avg, E301, E303, E304); 28% (30-day avg, E302).
20.2.32 NMAC	Coal Burning Equipment: NO ₂		E301, E302, E303, E304	X	Limits Nox emissions from main boiler stacks. 0.45 lb/mmBtu (3-hr avg E301, E303, E304); 0.7 lb/mmBtu (3-hr avg, E302).
20.2.61 NMAC	Smoke and Visible		See Note	X	The SJGS are exempt/insignificant sources, but still must meet opacity limits per 20.2.61 NMAC.

STATE REGU- LATIONS CITATION	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	JUSTIFICATION FOR USE:
	Emissions				Note: Emergency Generators, E602, E603, E604, E605, E606
20.2.70 NMAC	Operating Permits	X		X	Source is major for NOx, CO, VOCs, SO ₂ , and Total HAPs.
20.2.71 NMAC	Operating Permit Fees	X		X	PTE is > 100 TPY, Source is major for NOx, CO, VOCs, SO ₂ , Formaldehyde, and Total HAPs. Yes, this facility is subject to 20.2.70 NMAC and is in turn subject to 20.2.71 NMAC.
20.2.72 NMAC	Construction Permits	X		X	This facility is subject to 20.2.72.200.A.2 NMAC.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	X		X	All Title V major sources meet the applicability requirements of 20.2.73.300 NMAC.
20.2.74 NMAC	Permits- Prevention of Significant Deterioration	Y		X	This facility is major for NOx, CO, TSP, PM ₁₀ , PM _{2.5} , VOC, and SO ₂ . Source is one of the 28 listed – PTE > 100 tpy This is a minor modification to a major PSD source.
20.2.75 NMAC	Construction Permit Fees	X		X	This facility is subject to 20.2.72 NMAC and is in turn subject to 20.2.75 NMAC.
20.2.77 NMAC	New Source Performance		See Note	X	This is a stationary source which is subject to the requirements of 40 CFR Part 60, as amended through September 1, 2002. Note: NSPS Subpart D for E301, E303, E304; NSPS OOO for certain limestone handling sources
20.2.84 NMAC	Acid Rain Permits		E301, E302, E303, E304	X	Requires SJGS to have an acid rain permit for the coal boiler units.
20.2.85 NMAC	Mercury Emissions Standards and Compliance Schedules for Electrical Generating Units	Y	E301, E302, E303, E304		Requires SJGS coal boiler units to comply with mercury emission provisions.
Air Quality Bureau Permit No. 66M6R1	20.2.72NMAC Air Permit	X		X	Incorporates state and federal emission limits plus permit specific emission limits, monitoring, recordkeeping and reporting conditions.
Consent Decree Limits	March 10, 2005 Consent Decree		E301, E302, E303, E304		Incorporates limits on SO ₂ emissions (90 % control annual avg.), PM (0.015 lb/mmBtu , filterable, 3-hr avg), NOx (0.30 lbs/mmBtu 30 day avg with additional study to determine final NOx limit) and mercury removal technology.

11.0 Federal Regulatory Analysis:

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	JUSTIFICATION FOR USE:
40 CFR 50	NAAQS	X		X	Defined as applicable at 20.2.70.7.E.11, Any national ambient air quality standard
NSPS 40 CFR 60, Subpart A	General Provisions		See Note	X	Applies if any other NSPS subpart applies. Note: NSPS Subpart D for E301, E303, E304; NSPS OOO for certain limestone handling sources
NSPS 40 CFR60 Subpart D	Electric Utility Steam Generating Units		E301, E303, E304	X	Establishes NOx , SO2, PM (Method 5) and opacity limits of boiler units 1,3 and 4. NOx limit is 0.7 lb/mmBtu (3-hr avg); SO2 limit is 1.2 lb/mmBtu (3-hr avg) and TSP 0.1 lb/mmBtu (3-hr avg).
40 CFR 60, Subpart OOO	Non-metallic Minerals		E803, E804, S805	X	NSPS standards for non-metallic minerals applies to certain portions of the limestone handling system.
NESHAPS 40 CFR 64	Compliance Assurance Monitoring		E301, E302, E303, E304	X	CAM applies to boiler units because they are each major emission sources (>100 tpy) and employ control equipment to insure compliance with emission limits.
NESHAPS 40 CFR 68	Chemical Accident Prevention	X		X	An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, 40 CFR 68. SJGS is potentially subject to chemical accident prevention assessment and planning.
Title IV – Acid Rain 40 CFR 72, Subparts B,D and I	Acid Rain		E301, E302, E303, E304	X	(a) Each of the following units shall be an affected unit, and any source that includes such a unit shall be an affected source, subject to the requirements of the Acid Rain Program: (1) A unit listed in table 1 of §73.10(a) of this chapter.(2) A unit that is listed in table 2 or 3 of §73.10 of this chapter and any other existing utility unit, except a unit under paragraph (b) of this section SJGS coal boiler units are subject acid rain permitting provisions and have an acid rain permit.
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions		E301, E302, E303, E304	X	The following parties shall be subject to the provisions of this part: Owners, operators, and designated representatives of affected sources and affected units pursuant to §72.6 of this chapter; (b) Any new independent power producer as defined in section 416 of the Act and §72.2 of this chapter, except as provided in section 405(g)(6) of the Act; (c) Any owner of an affected unit who may apply to receive allowances under the Energy Conservation and Renewable Energy Reserve Program established in accordance with section 404(f) of the Act;(d) Any small diesel refinery as defined in §72.2 of this chapter, and (e) Any other person, as defined in §72.2 of this chapter, who chooses to purchase, hold, or transfer allowances as provided in section 403(b) of the Act. SJGS coal boiler units must hold sufficient annual SO2 allowances.
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program		E301, E302, E303, E304	X	SJGS has filed a NOx averaging plan with EPA and submits required reports.
40CFR77 Excess Emissions	Excess emissions reporting		E301, E302, E303, E304	X	

FEDERAL REGU- LATIONS CITATION	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	JUSTIFICATION FOR USE:
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	X		X	SJGS is subject to this part for servicing motor vehicles.

12.0 **Exempt and/or Insignificant Equipment that do not require monitoring:**

Title V - INSIGNIFICANT ACTIVITIES (Dated March 24, 2005) as defined by 20.2.70.7.P NMAC:

No changes due to this permit action.

The Data Center Emergency generator is exempt since it provides power during periods of loss of commercial power.

13.0 New/Modified/Unique Conditions (Format: Condition#: Explanation):

From NSR 0063M6R1

Units S518/E518 and S519/E519 added to Specific Condition 1.a, Table 1.1 and Condition 1.j. Condition 1.j required baghouses on Units E505, E506, E518, E519 and E803; however there were no Monitoring, Recordkeeping or Reporting requirements to demonstrate compliance. Conditions 3.n and 4.t were added so PNM could demonstrate compliance. Unit E803 is considered exempt under NSR regulation and is a regulated piece of equipment under Title V since it is subject to 40 CFR 63 Subpart OOO.

14.0 For Title V action: Cross Reference Table between NSR Permit 0063M6R1 and TV Permit P062R2. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

NSR Changed by TV*	0063M6R1 NSR Condition #	P062R2 TV Section #
	1.a Revision and Operation – Regulated Equipment List	A104.A Process Equipment, and TV renewal application
	1.b continuous operation	A108
	1.c Applicable requirements	A103.C Applicable Requirements
	1.d Applicable requirements, NSPS Subpart D to Units E301, E303, and E304	A103.D Applicable Requirements
	1.e Applicable requirements, NSPS Subpart OOO for units that are a part of the limestone handling system.	A103.E Applicable Requirements
	1.f Applicable requirements, 20.2.14 20.2.31 and 20.2.32 NMAC for units E301-E304.	A103.F Applicable Requirements
Deleted	1.g Opacity Limits schedule for Units E301-E304	N/A
Deleted	1.h Operational requirements: Must operate ESP until Baghouses are operational	N/A
	1.i Operational requirements: For Road Areas	A406.A Road Area Operational Requirements
E518 and E519 not mentioned in TV	1.j Operational requirements: fly ash silo loading (E505, E506, E518, and E519) and limestone silo loading (E803)	A407.B Fabric Filter Operational Requirements: Emission Units E506 and E507 (fly ash silo loading) and E803 (limestone silo loading)
	1.k Operational requirements: coal pulverizers (E201)	A402.K Coal Pulverizer Requirements
XXX	1.l Operational requirements: emergency generators shall burn only No. 2 Diesel Fuel Oil	A403.A Emergency Generator Operating Hours Limits
	1.m Operational requirements: emergency generators operations	A403.A Emergency Generator Operating Hours Limits
	1.n Operational requirements: raw materials processing limits	A406.B Facility-Wide Raw Material Limits
	1.o Operational requirements: good air pollution control practices to minimize emissions	A406.C Miscellaneous Units Operational Requirements
	1.p Operational requirements: boiler baghouse requirements	N/A
	1.q Operational requirements: ESP vs baghouse switch over.	N/A
		A402.B CAM Rule Corrective Action Requirements
New language	1.r Operational requirements: Boilers – limestone scrubbers	A402.D LSFO Scrubber Operations
	1.s Operational requirements: duct leak management program on Units E501, E502, E503, and E504	A402.C Expansion Joint Maintenance Program (EJMP) Operational Requirements
NSR didn't include SO2 CEMS	1.t Operational requirements: NOx CEMS for Units E501, E502, E503, and E504	A400.B Acid Rain Program
New	1.u Operational requirements: Heat input to these boilers shall not increase as a result of installation of the low-NOx burners.	A402.E Operation Requirement

NSR Changed by TV*	0063M6R1 NSR Condition #	P062R2 TV Section #
New	1.v Operational requirements: baghouse for each activated carbon silos	A407.A Operation Requirement
New	1.w Operational requirements: injection point of activated carbon.	A407.A Operation Requirement
New	1.x Operational requirements: activated carbon baghouse equipped and operated with a device to continuously monitor the pressure differential across the baghouse.	A407.A Operation Requirement
New	1.y Operational requirements: install, maintain, and operate mercury CEMS	A400.C Operation Requirement
XX	1.z Operational requirements: next significant revision (0063-M7) shall include condensable emissions and PM _{2.5} emissions.	See footnote 4 to Table 402.H.
EMISSION LIMITS		
	2.a Table 2.1. Maximum Allowable Individual Emissions for Units E301-E304	Table 106.A
	2.b Table 2.2. Maximum Allowable Combined Emissions for Units E301-E304	A106.B Emission Limits for E301-E304
New	2.c Table 2.3. Maximum Allowable Individual Emissions for Units E301-E304 after Effective dates from 1.g.	A106.A
	2.d Table 2.4. Maximum Allowable Emissions for Duct Leaks after Effective dates from 1.g.	A106.C Emission Limits for Boiler Duct Leaks
	2.e Table 2.5. Maximum Allowable Emissions for Non-Boiler Units.	A106.D Emission Limits for Non-Boiler Units
	2.f NO _x Emission Limits, CEMS and 40 CFR 75	A106.E
	2.g SO ₂ Emission Limits, CEMS and 40 CFR 75	A106.F
	2.h PM ₁₀ Emission Limits IAW NSPS Subpart OOO	A106.G NSPS Emission Limits for Limestone Process Equipment
	2.i Opacity Limits for generators	A106.H Opacity Limits for Emergency Generators
	2.j Cooling Towers TDS Limits	A405.A Cooling Tower Operational Requirements
New	2.k Activated Carbon baghouse silos designed and operated for no visible emissions.	A106.I; added language concerning mercury controls based on CD 9d.
New		A106.J Annual emission limits used for Title V Annual Fees
Monitoring Requirements		
	3.a Table 3.a Affected Units and applicable monitoring requirements	A103.C, A106.G, A400.B, A402.F&G
		A400.A Acid Rain Program Monitoring
	3.b COMS for Units E301, E303, and E304 NSPS Subpart D	A402.F NSPS Subpart D Monitoring
		A402.G 20.2.31 NMAC SO ₂ Monitoring
	6.b	A402.H Periodic Stack Test Monitoring
	3.c COMs installation for Unit E302.	A402.F
New	3.d Pressure drop across fly ash baghouse	A407.B
	3.e Continuous pressure drop across baghouse for Boilers E301-E304.	A402.A Fabric Filter Monitoring
		A402.B CAM Monitoring
		A402.D SFO Scrubber Operations Monitoring
New	3.f Pressure drop across each activated carbon silo baghouse	A407.A
New	3.g Annual inspection of coal pulverizers	A402.K
	3.h Annual inspections of coal pile maintenance, fly ash silo unloading to trucks, limestone delivery, and limestone pile maintenance.	A406.C
XXX	3.i operating hours of emergency generators.	A403.A
	3.j Quantities of coal, diesel fuel, and limestone processed.	A406.B
	3.k Quarterly measure TDS concentration of each cooling tower.	A405.A Cooling Tower Emissions Monitoring
New	3.l Daily-24-hr period coal flow to each boiler.	A406.B
New	3.m Continually monitor mercury emissions using CEMS	A400.C
New	3.n Pressure drop across baghouse for Units E505, E506, E518, E519, and E803.	A407.B

NSR Changed by TV*	0063M6R1 NSR Condition #	P062R2 TV Section #
4. Recordkeeping		
	4.a Maintain records on-site for 5 years	B109.B
	4.b Table 4.1 Affected Units and applicable recordkeeping requirements	N/A
		A400.B Acid Rain Program Recordkeeping
		A103.D, A402.J NSPS Subpart D Recordkeeping
		A402.G 20.2.31 NMAC Recordkeeping
		A406.D NSPS Subpart OOO Recordkeeping
		A402.H Periodic Stack Test Recordkeeping
		A406.D Periodic Visual Monitoring Opacity Recordkeeping
	4.c Haul Roads	A406.A Road Area Recordkeeping
New	4.d Fly ash baghouse pressure drop, Units E701-E707	A407.B
	4.e Boiler baghouse pressure drop for Units E301-E304	A402.A Fabric Filter Recordkeeping
	4.f Activated carbon silo baghouse pressure drop for Units E901-E904.	A407.A
	4.g Manufactures documentation of pressure drop range for Units E901-E904.	A407.A
	4.h Manufactures documentation of design for PM control and baghouse exhaust flow for Units E901-E904.	A407.A
	4.i inspections of coal pulverizes	A402.K
	4.j Inspection records of coal pile maintenance, fly ash silo unloading to trucks, limestone delivery, and limestone pile maintenance.	A406.C
XX	4.k Monthly and 12-month total operating hours of each emergency generator.	A403
	4.l Quarterly quantities of coal, diesel fuel and limestone processed.	A406.B
	4.m Quarterly measure TDS concentration of each cooling tower. Calculate individual cooling tower emissions.	A405.A
	4.n Record of review of duct leak management practices.	A402.C
	4.o Calculate the 24-hour heat input value of each boiler.	A402.E
	4.p Records of "as-delivered" heat content of the coal.	A402.E
	4.q The 365-day rolling total heat input for each boiler.	A402.E
X	4.r After the low-NOx burner installation, record operational parameters used to achieve NOx limits for first 12-months of operation.	Task completed and not included.
	4.s Records of mercury CEMS outputs, calculation, any CEMS maintenance events for continual mercury emission rates.	A400.C
	4.t Pressure drop across fabric filters for Units E505, E506, E518, E519, and E803.	A406.B
		A402.B CAM Recordkeeping
		A402.D LSFO Scrubbers Operations
5. Reporting		
	5.a Table 5.1 Affected Units and applicable reporting requirements	A109
Completed task.	5.b Calculate and report Historical 12-month total heat input for each boiler, per 4.p and 4.q	Not included since task was completed.
	5.c Upon request, summarize and report 365-day rolling total heat input values for each boiler used in 4.q.	A402.E
		A402.H Periodic Stack Test Reporting
		A402.F Periodic Visual Monitoring of Opacity Reporting
		A402.B CAM Reporting
Compliance Test		
	6.a No new testing requirements	NSR Unique

NSR Changed by TV*	0063M6R1 NSR Condition #	P062R2 TV Section #
	6.b Quarterly testing requirements for Boilers Units E301-E304	A402.H Periodic Stack Test Monitoring
	6.c PM ₁₀ and PM _{2.5} testing shall include condensables	A402.H
YES	6.d Actual PM ₁₀ and PM _{2.5} emission test every 5 th calendar quarter.	A402.H
YES	6.e PM ₁₀ testing is waived until test method established by USEPA.	A402.H
YES	6.f PM _{2.5} testing is waived until test method established by USEPA.	A402.H
	6.g Maintain CEMS IAW 40 CFR Parts 60 and 75	A402.H
	6.h Previous testing requirements are still in effect.	B111
	6.i Additional testing may be imposed	B111
	6.j Test schedule after startup and normal production	B111
	6.k For all periodic monitoring events, 90% load	B108 General Monitoring Requirements
	6.l Test Methods	B111
	6.m Upon request, provide temporary Teflon lines for compliance tests.	B111
	6. Compliance Test	B111

NSR conditions identified as “NSR Unique” do not establish any applicable requirements or federally enforceable conditions that require adoption in the TV operating permits.

15.0 Permit specialist’s notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.

- 15.1 In spring of 2009, the last of the Fly Ash Silo baghouses will be installed and the ESPs will not be energized any longer. The ESPs will physically be a wide spot in the duct work and allows slow TSP to fallout due to velocity slowing down. After the work is completed, all conditions in the NSR and TV permits related to ESP operation can be deleted.
- 15.2 7/14/10: following the conference call yesterday with PNM, Nancy Norem, Danny Kimball, Ralph Williams (consultant), and NMED, Joe Kimbrell, Ned Jerabek, Scott Vail, agreement was made that the CAM Plan Indicator #1 for the COMS setting would be reduced from 10% Opacity to 6.0% Opacity with COMS data submitted after an additional 12 months of collection. As the bags age up to a possible maximum age of 7 years, PNM doesn’t know the effects of age on the COMS readings. PNM or NMED will request changes as the data justifies. PNM and NMED agreed on the wording changes to the EJMP Condition A402.C.
- 15.3 7/14/10 added new Condition A402.I for Demister Operations based on requirements from the Demister Settlement Agreement. In a conference call on 8/31/10, PNM and NMED agreed to change the pressure drop from 0.3 inches (water column) to 0.5 since the higher number was more appropriate, see emails dated 8/31/10, 9/10/10.
- 15.4 7/22/10 see PNM comments to draft permit dated June 3, 2010 and NMED’s reply comments dated July 26, 2010. Many changes were made to the proposed permit due to these comments.
- 15.5 7/30/10 per agreement with PNM(conference call with PNM, Nancy Norem, Danny Kimball, Ralph Williams (consultant), and NMED, Joe Kimbrell), Units E602, E603, E604, E605, E606, and E607 (emergency generators) were removed from permit condition since there meet the definition of emergency generators and insignificant activities. 12/23/10 jk, After further review with Richard Goodyear, it was determined that since the NSR Permit established federal enforceable conditions for these engines which overruled the definition of emergency generators and insignificant activities. PNM must revised the NSR permit to remove these conditions and justify again that the units meet the definition of emergency generators. In PNM’s 1/7/11 comments, PNM requested the Opacity condition be removed and it was removed 1/10/11.

- 15.6 10/4/2010: Considering adding Compliance plan for submitting PSD netting analysis for NSR Permit 0063M4 that was issued 9/8/2006. May not be appropriate to do this in TV permit, since it has nothing to do with the facility being out of compliance and bring them back into compliance. Was not added to Permit P062R2.
- 15.7 Condition A103.F didn't have the table 1.3 from NSR Permit 66M6R1, so it was added on 12/23/2010.
- 15.8 General Condition B110.J was removed since it had been combined with B110.A.
- 15.9 1/13/2011, the following comments and updates to the permit as result of PNM comments:
- PNM Comment 1: Section A402H: Footnotes 3 and 4 to "Table 402H: Quarterly Testing Requirements" need clarification. In particular, the proposed wording is unclear regarding time frame and frequency of required compliance testing. In addition, the PM₁₀/PM_{2.5} testing rule published by the EPA on December 21, 2010 contains unresolved issues as it applies to the SJGS boiler stacks. Specifically, the 201A method (Section 1.5) states: "You cannot use this method to measure emissions in which water droplets are present because the size separation of the water droplets may not be representative of the dry particle size released into the air. To measure filterable PM₁₀ and PM_{2.5} in emissions where water droplets are known to exist, we recommend that you use Method 5 of appendix A-3 to Part 60." The boiler stack exhaust at San Juan Generating Station is known to contain water droplets. Therefore, Method 201A is not applicable for filterable PM₁₀ or filterable PM_{2.5} measurement. The "recommended" use of Method 5 will be overly-conservative as this method measures total filterable PM, which may overestimate filterable PM₁₀ and, to an even greater extent, filterable PM_{2.5}. In the preamble "Comment and Response" section of the 201A rule, EPA states: "We are currently developing a method to measure PM in stacks with saturated water vapors and laboratory testing is ongoing. EPA has committed a significant budget and personnel to developing an accurate method for sources with wet stacks and we plan to offer the method and protocol as soon as possible." This statement indicates that development and promulgation of a Method applicable to wet stacks could be completed before the term of this current Operating Permit term expires. Because of this issue, PNM believes the wording in the current Operating Permit should recognize that use of Method 5 (or 5i) to determine filterable PM₁₀ and PM_{2.5} is an approximate and conservative method that will be applied only until EPA publishes a Method approved for use in wet stacks. It should be noted that the wording in Conditions 6 b through c of the NSR permit indicate that the use of Method 5 (or 5i) as a surrogate for PM₁₀ and PM_{2.5} is acceptable until EPA establishes a test Method for PM₁₀ and PM_{2.5} that measures "actual" PM₁₀ and PM_{2.5} emissions, including condensable particulate matter. PNM interprets these NSR permit conditions to mean that SJGS will proceed with quarterly Method 5 (5i) testing. Once every 5th quarter (not necessarily the same quarter for each unit), SJGS will use Method 201A to determine the condensable portion of the PM₁₀ and PM_{2.5}. The method 5 or 5i results will be used as a surrogate for PM₁₀ and PM_{2.5} filterable emissions. If it appears that combining condensable emission test results with the surrogate emission test results from the filterable Method 5i quarterly testing would exceed current lb/hr and ton/year emission limits, then PNM would request a modification of the permit limits to account for the results of the condensable particulate matter test. Regardless of the outcome of the process described above, PNM would utilize the new EPA Method is

developing for measuring “actual” filterable PM₁₀ and PM_{2.5} in wet stacks, once it is finalized. To address these issues, PNM proposes the following language for Footnotes 3 and 4: Footnote 3: PM₁₀ and PM_{2.5} particulate emissions include condensable particulate matter. Footnote 4: PNM shall conduct compliance testing to determine the condensable portion of actual PM₁₀ and PM_{2.5} emissions using EPA Method 201A. Initial testing using Method 201A shall be conducted prior to June 30, 2011 for each unit. Thereafter, each unit shall be tested using Method 201A at least once every five calendar quarters. PNM will also conduct a Method 5i test at approximately the same time it conducts each Method 201A test. If the results of the two tests indicate that total PM emissions for any unit may be above the PM₁₀ or PM_{2.5} lb/hr or ton/year filterable emission limits for that unit, PNM shall request a modification to the allowable PM emissions rate for that unit within 90 days of the completion of the tests, but the test results will not constitute a violation of the current emission limits or trigger any other Prevention of Significant Deterioration permitting requirements. When EPA establishes a test method for PM₁₀ and PM_{2.5} that allows testing of total actual filterable PM₁₀ and PM_{2.5} in wet stacks, this test method will be used by PNM in place of the quarterly Method 5i test. Compliance testing for the actual filterable portion of PM₁₀ and PM_{2.5} emissions is not required until EPA establishes a method that is applicable to the wet stack conditions of the SJGS boiler stacks. **NMED Reply:** After more review, we agree with your assessment of the new EPA Method Test 201A and agree with the revised language you proposed.

- PNM comment 2: Section A403: Even though emergency generators are specifically identified as insignificant activities on the NMED's list of Insignificant Emission Sources (Item 7 on list), and are also exempt sources for NSR permitting, Section A403 imposes opacity testing requirements on the emergency generators. Opacity testing is not required for such sources, under 20.2.61 NMAC. PNM agrees that it may be appropriate to include permit conditions to ensure the engines do not exceeded 500 hours of operation per year, and thus maintain their insignificant/exempt status, but NMED should not require opacity testing for insignificant/exempt sources. As such, PNM requests that the opacity requirements in A.403.B be deleted. **NMED Reply:** We disagree with your assessment. Yes, there is an emergency generator exemption in 20.2.72.202.B.(3) NMAC. However, NSR Permit 0063M6R1 Condition 1.i and 1.m does not mention the exemption and therefore is a Federally Enforceable Condition. As a Federally Enforceable condition established in the New Source Review Permit, it must be placed in the Title V permit. The fact that it is now a federally enforceable condition, the fact that in general the generator could meet the NSR exemption and the definition of an Insignificant activity in the Title V program is irrelevant at this point. If in the future you may wish to make this point during your next modification to your NSR permit and ask for the federally enforceable condition be removed from your permit since it meets the exemption criteria and does not belong in your permit. With regards to part two of the comment that the Opacity testing for the emergency generators should be deleted. NSR Permit 0063M6R1 Condition 2.i established federally enforceable conditions for the opacity testing for the emergency generator. To me, it is clear that the any exemption for these units does not apply since the NSR Permit has established these specific conditions and therefore can not be relaxed by this Title V permit P062R2.
- PNM Comment 3: Section A402I: This section indicates that a pressure drop of 0.3 inches (water column) is to be used as an operating indicator for demister operations. PNM and the Department have discussed this issue in response to earlier drafts of the Operating Permit and PNM indicated that 0.5 inches would be the appropriate

pressure drop to use for this purpose. The 0.5 inches pressure drop was included in proposed language sent by Nancy Norem (PNM) to Joe Kimbrell (initial email August 31, 2010 and a second email sent September 10, 2010). Mr. Kimbrell's email in response to these suggestions (September 14, 2010) indicates he agreed with using 0.5 inches pressure drop. PNM requests that the 0.3 inches included in the current draft permit be replaced with 0.5 inches. The reporting section of A402I states that reporting shall be "Quarterly in accordance with the Consent Decree." PNM requests the specific reporting requirement be expressly stated in this section rather than referencing the Consent Decree. PNM agrees that it may be necessary and appropriate to reference the Consent Decree where it is the only underlying source of authority for a permit condition. However, for recordkeeping and reporting requirements established by a generally applicable regulation, the Operating Permit should state the requirement and cite to the regulation, rather than incorporate by reference provisions of a Consent Decree that is expected to terminate during the term of the permit. **NMED Reply:** We agree the Pressure drop should be changed from 0.3 to 0.5 as previously agreed. The other changes to Condition A402.I from the September 10 email was added back also. Part 2 of the comment was related to the Reporting for Condition A402.I. This has been reworded to show the lowest citation of the Consent Decree and what reporting would be required after the Consent Decree is terminated. See revised language [here](#). **Reporting:** Quarterly reporting is required in accordance with the Consent Decree, Section X, Reporting, Paragraphs 22-26. Once the Consent Decree is terminated then the quarterly reports shall be prepared and maintained onsite in accordance with Condition B110.A. The Quarterly reports will continue to be summarized in the semi-annual reporting.

- PNM comment 4: Table 104A: Two new emission units were added to the list of regulated equipment, Emission Units E804 and E085. The reason for adding these emissions units to this list is not clear. Can the Department please clarify the reason for these additions? **NMED Reply:** Existing Emission Units E804 and E805 were added to the Regulated Equipment list since the two units are regulated by the fact that they are subject to 40 CFR 60, Subpart OOO (see Conditions A406.D, Table 103.A), also emission limits are established for these units in Table 103.C.
- PNM comment 5: Section B105: PNM requests that language be added to this section to allow alternate submittal procedures, if directed to do so by the Department, because it is our understanding that NMED is currently in the process of changing the procedure for submitting excess emission reports. **NMED Reply:** B105 Submittal of Reports and Certifications. There are no pending changes to the language in this section. NMED is working on an alternative method of excess emissions reporting using a web application, but that could be 6 months, a year or more in the making. The Enforcement and Compliance Section always has enforcement discretion to require or approve an alternative method of compliance from what is written in permit conditions. **However, we will revise Conditions B105.A and B like this "Excess Emission Reports shall be submitted electronically to eeereports.agb@state.nm.us or as directed by the Department. (20.2.7.110 NMAC)".**
- PNM comment 6: Section A109: PNM is very supportive of Department procedures, policies, and permit conditions that will limit unnecessary or duplicative report submittals. However, PNM is concerned that the replacement of the word "submitted" with the word "prepared" in part C of Section A109 may be inconsistent with the regulations. Not only does NSR permit 0063M6R1 contain language that

requires actual submittal of quarterly reports, many of the underlying applicable requirements (both state and federal) also require quarterly report submittals. The rule does not appear to allow on-site record maintenance to substitute for actual report submittals. For example, the SJGS boiler units are subject 20.2.31 NMAC, Sections 113A and 113B which explicitly state that owners or operators of coal burning equipment must “submit” quarterly reports and those reports must be “received by the Department” within 45 days after the end of each quarter. Table 5.1 of the NSR permit specifically lists 20.2.31 NMAC, Sections 113A and 113B, under the heading of “Applicable Reporting Requirements.” To insure continued compliance with underlying applicable requirements, PNM will continue to submit the required information on the schedules specified in the regulation. **NMED Reply: A109.C reports. We agree with your assessment and have reworded the A109.C as shown here.** “The quarterly reports required by NSR Permit 0063M6R1 and quarterly reportable items required by this permit shall be submitted quarterly.”

15.10 Note to Joe: PNM should not use 24-hour average NOx limits. They should be using hourly averaging period. This was discussed at Staff meeting on 4/6/11. For 20.2.33 NMA NOx 0.3 lb/MMBtu limit, the permit writer needs to add averaging time of hourly.

15.11 Comments from NMED response to EPA Order concerning public comment and petition by WildEarth Guardians.

- Claim I.B – The prior discussion concerning PSD requirements for installation of low-NOx burners will be summarized in a revised Statement of Basis for the re-opened permit.
- NMED will also revise the Statement of Basis and will further supplement the permit record by reference of the response to the EPA Order, to address final actions on all Claims.
- The re-opened Title V Permit P062R2M2 addressed the following:
 - 1) Claim I.A – No action
 - 2) Claim I.B –add compliance plan requiring PSD Netting Analysis within 180 days following issuance of permit P062R2M2. Update and revise the record through the Statement of Basis (P062R2M2)
 - 3) Claim II – No action
 - 4) Claim III – Revision to Condition B110
 - 5) Claim IV.A - Revision to Condition B108.D(3)
 - 6) Claim IV.B –attach copy of PNM’s duct leak management program to the permit and summarize discussion in the statement of basis.
 - 7) Claim V –removal of Condition B112.E

15.12 Summary Comments on subject of Emissions Monitoring for Duct Leaks:

- EPA appears to have granted the WEG Petition on Claim 4B due to a lack of information in the permit record regarding PNM’s duct leak management program, which the Title V permit requires PNM to prepare and implement. As noted in the RTC, the program was approved by the Department and included in the Construction Permit modification 0063M4 issued September 8, 2006 and in the Title V Permit P062R1 issued February 2, 2005. Condition 402.C also

requires additional detail in the development of the Expansion Joint Maintenance Plan.

- Duct Leak emissions consists of PM2.5 and PM10 uncontrolled flue gas stream upstream of the PM control system escaping from the expansion joints in the exhaust ducts from each boiler. The ducts are massive in size and emissions are calculated based on gas stream composition and flow, and assumptions on size and frequency of holes or cracks in the ducts. There is no way to predict the location and frequency of these leaks. When stack or performance tests are not suitable monitoring techniques, operational inspections and maintenance and repair monitoring are valid forms of monitoring to demonstrate compliance with emissions limits and minimize emissions. NMED required PNM to develop and submit quarterly inspection and maintenance plan see attached.

The goal of the Expansion Joint Maintenance Program is to minimize leaks from the boiler exit duct expansion joints. This will be accomplished through quarterly inspections and a maintenance program. Each units ducts are inspected at between 64 and 92 inspection points. The plan includes threshold limits for total leaks and a tried maintenance plan to ensure the severe leaks are fixed immediately and minor leaks receive temporary repairs with follow-up repairs later.

Based on the above discussion, NMED concludes that San Juan Duct Leak Management Program has been prepared and approved and is sufficient to minimize duct leak emissions from the facility. NMED agrees to supplement the record with the Duct Leak Management Program and with this discussion in response to EPA's Order.

- Based on the above discussion, NMED concludes that San Juan Duct Leak Management Program has been prepared and approved and is sufficient to minimize duct leak emissions from the facility. NMED agrees to supplement the record with the Duct Leak Management Program and with this discussion in response to EPA's Order.

15.13